

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

ONEBEACON INSURANCE COMPANY	§	
	§	
Plaintiff,	§	
	§	Civil Action No.
v.	§	
	§	H-11-3061
T. WADE WELCH & ASSOCIATES, <i>et al.</i>	§	
	§	
Defendants.	§	

**PLAINTIFF’S UNOPPOSED MOTION TO APPROVE JUDGMENT SECURITY**

Plaintiff OneBeacon Insurance Company, n/k/a Bedivere Insurance Company (“OneBeacon”) respectfully moves this Court to approve security for a stay of the judgment and postjudgment orders pending appeal, pursuant to Fed. R. Civ. P. 62(d).

1. On April 20, 2015, this Court signed an Order Granting Stay Pending Resolution of Post-Judgment Motions and Approving Supersedeas Bond [Dkt. No. 427]. That order approved OneBeacon’s supersedeas bond No. SNN4001626 as a bond to secure the judgment pending resolution of post-judgment motions. The order further provided that

in the event that OneBeacon Insurance Company files an appeal in this matter and seeks a stay of the execution of the final judgment pending appeal, the security to stay the judgment pending appeal, under Fed. R. Civ. P. 62(d), may include Bond No. SNN4001626 and such supplemental security, if any, in any additional amount that the Court may order to further secure the judgment pending appeal.

2. On August 24, 2015, this Court signed an order [Dkt. No. 457] awarding the Welch Litigants \$4,022,303.25 for attorneys’ fees, plus post-judgment interest, against OneBeacon.

3. On August 31, 2015, this Court signed an order [Dkt. No. 459] awarding DISH

Network Corporation \$2,933,984.81 for attorneys' fees and costs, plus post-judgment interest, against OneBeacon.

4. The parties have agreed, without prejudice to the judgment creditors' right to seek an increase in the judgment security based on the further passage of time, that security in the amounts awarded against OneBeacon, together with post-judgment interest and additional (\$1,720.70 per day) damages through September 17, 2016, will be sufficient to secure the judgment and post-judgment orders.

5. The Supplemental Supersedeas Bond attached to this motion as Exhibit 1, in conjunction with Supersedeas Bond No. SNN4001626, provides such security.

OneBeacon Insurance Company, n/k/a Bedivere Insurance Company, therefore respectfully prays that the Supplemental Supersedeas Bond attached to this motion as Exhibit A be approved by the Court; that the Court grant a stay of the judgment and post-judgment orders; and for such other and further relief to which it may be entitled at law or in equity.

Respectfully submitted,

/s/ P. Michael Jung

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ATTORNEYS FOR PLAINTIFF

**CERTIFICATE OF CONFERENCE**

I hereby certify that I have contacted T. Wade Welch, Esq., counsel for the Welch Litigants, and Rees Morgan, Esq., counsel for DISH Network Corporation, concerning this motion. Messrs. Welch and Morgan have stated that this motion is unopposed.

/s/ P. Michael Jung  
P. MICHAEL JUNG

**CERTIFICATE OF SERVICE**

I hereby certify that this Plaintiff's Unopposed Motion to Approve Judgment Security has been served on the defendants by electronic service through the Court's ECF system on: Rees F. Morgan, Esq., Attorney for Defendant DISH Network Corporation, at ef-rfm@cpdb.com; J. James Cooper, Esq., Attorney for Defendant DISH Network Corporation, at jcooper@gardere.com; T. Wade Welch, Esq., Attorney for Defendants T. Wade Welch & Associates and T. Wade Welch, at wwelch@twlaw.com; and David Miller, Esq., Attorney for Defendants T. Wade Welch & Associates and T. Wade Welch, at dmiller@msc-lawyer.com; all on this 28th day of September, 2015.

/s/ P. Michael Jung  
P. MICHAEL JUNG